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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Administration of the North American
Numbering Plan

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CC Docket No. 92-237,
Phase I

Reply Comments of the
Cellular Telecommunications Industry Association
on the Notice of Inquiry

The Cellular Telecommunications Industry Association ("CTIA") hereby submits its Reply Comments to parties' comments filed December 20, 1992 in the above-captioned matter. These pleadings were filed pursuant to the Federal Communication Commission's ("Commission") Notice of Inquiry ("NOI"), released October 29, 1992, regarding the National Association of Regulatory Utility Commissioners' petition for investigation of the North American Numbering Plan ("NANP"). These Reply Comments address the Phase I issue of overall administration of the NANP, and how the administration might be improved.¹

In its initial Comments, CTIA demonstrated that the present administration of NANP, under the Bell Communications Research Corporation ("Bellcore"), is unworkable due to the diffuse nature of the process and the lack of non-discriminatory policy guidelines which combine to delay and frustrate the development of a coherent

¹ Administration of the North American Numbering Plan, 7 FCC Rcd 6837 (1992) ("NOI").

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numbering plan.² Further, CTIA argued that a NANP "Policy Group," formed outside of Bellcore, must be created. The Policy Group would be comprised of all telecommunications providers who would, inter alia, develop and establish fair numbering policies and guidelines that govern the actual administration and assignment of numbers and codes.

A significant number of commentators on this issue agree with CTIA that the current climate of ad hoc administration of NANP has led to unfair and discriminatory practices which must cease.³ These same commentators are in agreement that an independent policy organization must be created to insure timely and equitable development and implementation of numbering policies and guidelines.⁴

Bellcore defends its administration of the NANP as fair and even-handed.⁵ However, the record in this proceeding, which describes how the local exchange companies ("LECs") dominate the number assignment process, belies Bellcore's claims. The comments of McCaw Cellular Communications ("McCaw") and Telocator describe how the current NANP administration process grants Bellcore and the LECs virtually unbridled discretion in the implementation and assignment of NXX codes. Generally speaking, concerns specific to wireless

² See Comments of the Cellular Telecommunications Industry Association at 2, CC Docket No. 92-237, filed December 28, 1992.

³ See, e.g., Comments of Ad Hoc Telecommunications Users Committee, Allnet Communications Services, Inc., AT&T, McCaw, NARUC, MCI, Sprint, Teleport Communications Group, DA 91-1307, filed December 20, 1992, respectively.

⁴ Id.

⁵ Comments of Bell Communications Research (Bellcore) as Administrator of the North American Numbering Plan at 3, DA 91-1307, filed December 20, 1992.

communications providers are not addressed or considered. The current NANP administration has resulted in discrimination against mobile service providers in the NXX assignment process.⁶ Further, as MCI argues, the introduction of competition has created a dramatically different environment. Given these parameters, NANP administration will now require addressing the needs of an expanded global customer base, which will have broad public policy implications. The result will affect the United States' ability to compete in global and domestic telecommunications markets, provide universal service, and introduce new telecommunications services.⁷

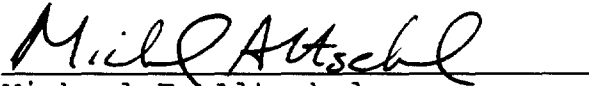
⁶ Comments of McCaw Cellular Communications, Inc. at 6, DA 91-1307, filed December 20, 1992; and Comments of Telocator at 3 - 5, DA 91-1307, filed December 20, 1992.

⁷ Comments of MCI Communications Corporation at 4, DA 91-1307, filed December 20, 1992.

Considering that the NANP was first devised by AT&T in the 1940's, it is apparent that in the emerging competitive telecommunications market of today, new approaches need to be implemented to address the concerns of all telecommunications providers. CTIA urges the Commission to endorse the establishment of a NANP Policy Group that will broadly represent and serve the interests and needs of today's diverse and competitive telecommunications industry.

Respectfully Submitted,

Cellular Telecommunications
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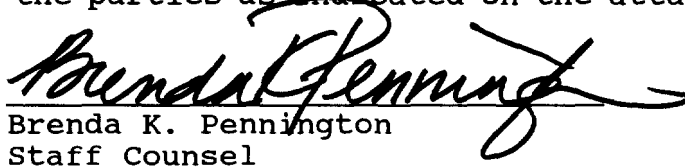
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I, Brenda K. Pennington, hereby certify that on this 24th day of February 1993, copies of the foregoing "Reply Comments of the Cellular Telecommunications Industry Association" were mailed, postage pre-paid, to the parties as indicated on the attached service list.


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